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Attorneys for Plaintiff  
Johnny Doe, a minor and through his Guardian, Jane Doe, on  
behalf of himself and all others similarly situated

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

JOHNNY DOE, a minor, by and through his  
Guardian, JANE DOE, on behalf of himself and all  
others similarly situated,

Plaintiff,

vs.

EPIC GAMES, INC., a North Carolina  
corporation,

Defendant.

Case No. 4:19cv3629

**DECLARATION OF DEEPALI  
BRAHMBHATT IN SUPPORT OF  
PLAINTIFF'S MOTION FOR LEAVE TO  
PROCEED UNDER PSEUDONYMS**

**CLASS ACTION**

1 I, Deepali Brahmhatt, hereby declare as follows

2 1. I am an attorney at the law firm of One LLP, counsel of record in the above-referenced  
3 action for Plaintiff. I make this Declaration upon personal knowledge and in support of Plaintiff's Motion  
4 to Proceed under Pseudonyms ("Motion"). I am over twenty-one years of age and not under any legal  
5 disability. If called and sworn as a witness, I would testify competently and truthfully as to the facts in this  
6 Declaration.

7 2. I know the identity of Plaintiff Johnny Doe and his guardian Jane Doe. Plaintiff is prepared  
8 to provide a statement of his true identity and his guardian's identity for the Court's in camera review,  
9 upon the Court's request.

10 3. Disclosing Plaintiff and his guardian's identities will lead to psychological distress and  
11 physical symptoms thereof, as well as have a negative impact in their personal and social lives. Plaintiff  
12 and his guardian's fear of discrimination and retaliation that may interfere with his life at school,  
13 neighborhood and community and ruin his ability to progress in his career and personal life, obtain future  
14 employment, and provide for his family are reasonable.

15 4. We respectfully request that this Court permit Plaintiff and his guardian to pursue his  
16 claims under pseudonyms to protect his privacy in this litigation.

17 I declare under penalty of perjury under the laws of the United States that the foregoing is true and  
18 correct.

19 Executed this 21<sup>th</sup> day of June 2019 in California.

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21 /s/ Deepali A. Brahmhatt  
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